

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: §
§ **Case No. 20-33948 (MI)**
FIELDWOOD ENERGY LLC, et al., §
§ **CHAPTER 11**
DEBTORS. §
§
§

**NOTICE OF CONTINUATION AND PERFECTION OF LIENS AND PRIVILEGES IN
CERTAIN PROPERTY OF THE DEBTORS' ESTATES
PURSUANT TO 11 U.S.C. § 546(b)**

Heartland Compression Services, L.L.C. (“*Heartland*”), appearing herein through undersigned counsel, hereby provides written notice pursuant to 11 U.S.C. § 546(b) of the continuation and perfection of interests in certain property of the estates of the Debtors Fieldwood Energy, LLC, et al.¹ (together, the “*Debtors*”), and in the proceeds, products, offspring, rents, or profits of such property, and in support thereof, respectfully represents:

1. Prior to the filing of voluntary chapter 11 petitions by the Debtors on August 3, 2020 and August 4, 2020, Heartland provided rental equipment, goods, and associated services to the Debtors in support of the Debtors’ digging, drilling, torpedoeing, operating, completing, maintaining, and/or repairing oil and/or gas wells in connection with the oil and gas leases listed on the following page (collectively, the “*Oil & Gas Properties*”):

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Holdings LLC (9264); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

a. **WEST CAMERON-66**

Lease #: OCS-G-01860
Area/Block: WC-66
Adjacent Parish: CAMERON

b. **GALVESTON-210**

Lease #: OCS-G-25524
Area/Block: GA-210
Adjacent Parish: GALVESTON

2. Pursuant to the Louisiana Oil Well Lien Act, La. R.S. § 9:4861, *et seq.*, Heartland timely preserved and perfected its liens and privileges over each of the Oil & Gas Properties, including but not limited to, the wells, buildings, pipelines, constructions, and other facilities thereon, by filing the lien affidavits attached hereto in Exhibit 1 (the “***Heartland Lien Affidavits***”):

- a. **WEST CAMERON-66:** Recorded in Cameron Parish, State of Louisiana (12/02/2020): File No. 348455. Attached hereto as **Exhibit 1.**
- b. **GALVESTON-210:** Recorded in Galveston County, State of Texas (12/17/2020): Instrument Number 2020081842. Attached hereto as **Exhibit 2.**

3. In accordance with 11 U.S.C. § 546(b)(1), Heartland hereby perfects, maintains or continues the perfection of and provides notice of intention to enforce its liens and privileges (the “***546 Interests***”) in the Oil & Gas Properties, together with such other property described in the Heartland Lien Affidavits and set forth in La. R.S. § 9:4861(12)(c) (collectively with the Oil & Gas Properties, the “***Encumbered Properties***”), and provides notice of its intention to enforce such liens and privileges with respect to such Encumbered Properties. The 546 Interests

perfected, maintained, and/or continued hereby extend in and to the proceeds, products, offspring, rents, or profits of such Encumbered Properties.

4. Heartland further provides notice that it objects and does not consent to (a) any effort to prime its perfected 546 Interests against the Encumbered Properties or any other property of Debtors' estates; and (b) any use of cash collateral that is the proceeds of hydrocarbons produced from the Encumbered Properties.

5. Heartland reserves the right to request relief from the automatic stay of 11 U.S.C. § 362, or any other appropriate relief, to enforce and defend its perfected 546 Interests against the Encumbered Properties or any other property of the Debtors' estates.

6. This Notice shall not be deemed an admission that any filing is necessary to perfect or maintain perfection of the 546 Interests under the Bankruptcy Code, the Louisiana Revised Statutes, or any other applicable law.

7. Heartland reserves the right to supplement or amend this Notice, including the amounts owed and to itemize any further attorneys' fees, costs, interest, or other amounts recoverable under applicable law.

8. Heartland files this Notice without limitation or waiver of any rights, claims, and defenses against Debtors, their bankruptcy estates, and any third parties.

Respectfully Submitted,

LUGENBUHL, WHEATON, PECK,
RANKIN & HUBBARD

/s/ Benjamin W. Kadden
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*Counsel for Heartland Compression Services,
L.L.C.*

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of December 2020, I filed the foregoing *Notice of Continuation and Perfection of Liens and Privileges in Certain Property of the Debtors' Estates Pursuant to 11 U.S.C § 546(b)* via this Court's Electronic Filing System and served same upon all parties receiving electronic notice in the above-captioned matter.

/s/ Benjamin W. Kadden